中國銀行
BANK OF CHINA

NOTICE TO BUSINESS CUSTOMERS

As part of the implementation of the Anti-Money Laundering Act of 2020 (AMLA), Congress enacted the Corporate Transparency Act (CTA) in 2021, which established Beneficial Ownership Information (BOI) reporting requirements for certain entities.

On August 11, 2026, the Financial Crimes Enforcement Network (FinCEN) further issued a final rule that permanently eliminates BOI reporting requirements for U.S. companies and U.S. persons under the CTA. The rule became effective on August 14, 2026.

According to FinCEN, the final rule provides that:

- U.S. companies are exempt from BOI reporting requirements and are no longer required to file BOI reports.
- Only certain foreign companies registered to do business in the U.S must report BOI.
- Reporting companies are not required to report BOI to FinCEN for U.S. person beneficial owners or U.S. person company applicants.
- U.S. persons are no longer required to provide BOI to reporting companies.
- U.S. persons who have obtained a FinCEN Identifier (FinCEN ID) are not required to update or correct information previously submitted to FinCEN.

For additional information regarding the BOI Reporting Final Rule, please refer to the following FinCEN resources:

- FinCEN BOI Reporting Main Page: https://www.fincen.gov/boi
- FinCEN Final Rule; https://www.federalregister.gov/documents/2026/08/14/2026-16576/beneficial-ownership-information-reporting-requirement-revision
- Final Rule FAQ: https://www.fincen.gov/news/news-releases/fincen-permanently-ends-beneficial-ownership-reporting-requirements-millions

We encourage customers to review these resources carefully and consult with your legal, tax, or compliance advisors to assess how the final rule may affect your organization in terms of any reporting obligations.

IMPORTANT: These changes apply only to BOI reports submitted to FinCEN under the CTA. They do not change financial institutions' separate obligations under applicable Bank Secrecy Act customer-identification and customer-due-diligence requirements. Accordingly, the Bank of China USA may continue to request beneficial ownership and related information as required by law and its risk-based compliance procedures.

Thank you for your continued partnership and cooperation in supporting regulatory compliance requirements.

This notice is provided for informational purposes only, and is not intended nor should it be construed as legal advice.